



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKM/TH

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 21, 2023

By ECF

The Honorable Sanket J. Bulsara
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: LoCurto v. United States, 10-CV-4589 (NGG)
Related to United States v. LoCurto, 03-CR-1382 (NGG)

Dear Magistrate Judge Bulsara:

The government respectfully submits this joint letter on behalf of the parties in response to the Court's June 14, 2023 order to request that the Court set a date for the evidentiary hearing in this case. Consistent with that order, the parties will attempt to come to an agreement on a proposed stipulation drafted by the government, see D.E. 172, in an effort to narrow the scope of the hearing. Counsel for defendant-petitioner Stephen LoCurto has also indicated that he intends to file a motion regarding certain privileged materials, see D.E. 113, 122.

The parties have conferred and are available for a hearing between September 13 - 15 or September 20 - 22, 2023. The parties are available for a pre-hearing status conference at the Court's convenience.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
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cc: Counsel for the defendant-petitioner (by ECF)